

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

RASHALL M. BRACKNEY-WHEELOCK,
PH.D.,

Plaintiff,

v.

Case No. 3:22-cv-35

CITY OF CHARLOTTESVILLE, *et al.*

Defendants.

CITY OF CHARLOTTESVILLE’S MOTION FOR PROTECTIVE ORDER

NOW COMES Defendant City of Charlottesville (“City”), by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and moves this Court to enter a protective order precluding RaShall Brackney from disseminating any documents, videos, photographs, or other information about City personnel that she obtained during the course of her employment with the City. The City relies upon and incorporates its Brief in Support of this Motion for Protective Order as if fully set forth herein.

WHEREFORE, the City of Charlottesville, respectfully requests that this Court grant the Motion for Protective Order, enter a Protective Order, and award such other relief as the Court deems proper, including the City’s fees and costs associated with bringing this motion.

CITY OF CHARLOTTESVILLE,

By Counsel

/s/ David P. Corrigan

David P. Corrigan (VSB No. 26341)

Melissa Y. York (VSB No. 77493)

Counsel for City of Charlottesville

Harman, Claytor, Corrigan & Wellman

P.O. Box 70280

Richmond, Virginia 23255

804-747-5200 - Phone

804-747-6085 - Fax

dcorrigan@hccw.com

myork@hccw.com

C E R T I F I C A T E

I hereby certify that on the 23rd day of November, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Alexander L. Taylor, Jr., Esq.
Alex Taylor Law
1622 W. Main Street
Richmond, VA 23220
804-239-9232 - Phone
866-446-6167 - Fax
alextaylor@alextaylorlaw.com

Charles Tucker, Jr., Esq.
The Tucker Moore Group
8181 Professional Place, Suite 207
Hyattsville, MD 20785
301-577-1175 - Phone
240-467-5678 - Fax
charles@tuckerlawgroupllp.com

William M. Stanley, Jr., Esq.
Autumn Dawn Price Johnson, Esq.
The Stanley Law Group PLLC
13508 Booker T. Washington Hwy
Moneta, VA 24121
540-721-6028 - Phone
540-721-6405 - Fax
rsmith@vastanleylawgroup.com
ajohnson@vastanleylawgroup.com

Joan C. McKenna, Esq. (VSB No. 37812)
Kayla A. Humenick, Esq. (VSB No. 90816)
O'Hagan Meyer, PLLC
411 East Franklin Street, Suite 500
Richmond, VA 23219
jmckenna@ohaganmeyer.com
khumenick@ohaganmeyer.com

Richard H. Milnor, Esq.
VSB No. 14177
Zunka, Milnor & Carter, Ltd.
P.O. Box 1567
Charlottesville, VA 22902
434-977-0191 x234 - Phone
434-977-0198 - Fax
RMilnor@zmc-law.com

s/David P. Corrigan
David P. Corrigan (VSB No. 26341)
Melissa Y. York (VSB No. 77493)
Counsel for City of Charlottesville
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 - Fax
dcorrigan@hccw.com
myork@hccw.com